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April 7, 2025

VIA ECF

Honorable Naomi Reice Buchwald
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Rina Oh n/k/a Rina Oh Amen v. Virginia L. Giuffre*
Case No.: 1-21-cv-08839 (NRB)

Your Honor:

I am the attorney for the plaintiff in the above referenced matter. I write, pursuant to Your Honor's Individual Rules, the S.D.N.Y. Standing Order on Sealing (21-mc-13), and § 6 of the S.D.N.Y. ECF Rules and Instructions, to respectfully request leave to electronically file sealed version of Exhibits B and C to the my declaration in opposition to defendant's motion for summary judgment, and the declaration of William H. Clark Ph.D.

Although "[t]he 'common law right of public access to judicial documents is firmly rooted in our nation's history,' this right is not absolute, and courts 'must balance competing considerations against' the presumption of access." In re E&C KB Holding GmbH, No. 22-mc-180 (LAK) (VF), 2023 U.S. Dist. LEXIS 27090, at *3 (S.D.N.Y. Feb. 14, 2023) *quoting* Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110, 119-20 (2d Cir. 2006).

Here, these Confidential documents were exchanged in discovery and concern the physical health records of the defendant and the mental health records of the plaintiff. Each of these documents are subject to the parties Stipulated Confidentiality Agreement and Protective Order. The public has no legitimate interest in the confidential documents, which concern purely non-public sensitive medical information about the parties, including Independent Medical Examinations.

Accordingly, Plaintiff respectfully requests that all access to the confidential Exhibits and the Declaration of Dr. Clark be restricted to counsel for the plaintiff and defendant. I wish to thank the Court for its attention to this matter.

Respectfully submitted,
Alexander Dudelson
Alexander M. Dudelson

Via ECF: All parties.